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7 *Attorneys for Defendants*
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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 GEORGE A. TOLIVER,

11 Plaintiff,

12 vs.

13 LAS VEGAS METROPOLITAN POLICE
OFFICERS, et al.

14 Defendants.
15
16

CASE NO.: 2:17-cv-02612-MMD-DJA

**JONATHAN SOLIS and JOEL
TOMLINSON'S MOTION TO EXTEND
DISPOSITIVE MOTION DEADLINE**

(1st Request)

17 Defendants, Jonathan Solis and Joel Tomlinson (collectively "LVMPD Defendants"), by
18 and through their counsel, Kaempfer Crowell, hereby move for an Order extending the current
19 dispositive motion deadline in this matter. This Motion is based on Federal Rule of Civil
20 Procedure 26 and Local Rule 26-3, the pleadings and papers on file herein, the following

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Memorandum of Points and Authorities and any such oral argument as may be set.

DATED this 10th day of June, 2020.

KAEMPFER CROWELL

By: /s/ Lyssa S. Anderson

LYSSA S. ANDERSON (Nevada Bar No. 5781)

RYAN W. DANIELS (Nevada Bar No. 13094)

1980 Festival Plaza Drive, Suite 650

Las Vegas, Nevada 89135

Attorneys for Defendants

Jonathan Solis and Joel Tomlinson

MEMORANDUM OF POINTS AND AUTHORITIES

I. PROCEDURAL HISTORY

Plaintiff served his Complaint filed June 5, 2019 on LVMPD Defendants on November 14, 2019. LVMPD Defendants filed their Answer on December 4, 2019. [ECF No. 28]. The parties submitted a proposed Discovery Plan and Scheduling Order on February 14, 2020. [ECF No. 40]. This Court entered a Scheduling Order on March 11, 2020. [ECF No. 41]. That Scheduling Order provides the current deadline to file dispositive motions of July 1, 2020.

LVMPD Defendants provided their Rule 26 Disclosures and first Supplement to Plaintiff. Defendants Tanner and Brandon (“State Defendants”) provide their Rule 26 Disclosures as well. Plaintiff never provided any disclosures to the Defendants. LVMPD Defendants served written discovery (Interrogatories, Requests for Admissions, and Requests for Production of Documents) on Plaintiff which Plaintiff responded to. Plaintiff also served written discovery on the State Defendants and LVMPD Defendants which was also responded to. Discovery in this matter is now complete and the deadline to complete discovery has passed.

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1 **II. AN EXTENSION IS WARRANTED**

2 Good cause is shown for the following reasons. First, as this Court is aware, Nevada
 3 Governor Steve Sisolak ordered that all non-essential businesses in the State of Nevada be closed
 4 due to the worldwide pandemic and spread of COVID19. Kaempfer Crowell did continue to
 5 work during the shutdown remotely. However, because of the social distancing standards and
 6 shut down, no in-person meetings were able to take place; no hearings took place; and no
 7 depositions took place. Nevada recently entered Phase II of re-opening and Kaempfer Crowell
 8 has resumed normal Office operations as of June 1, 2020. Likewise, this Court resumed on June
 9 3, 2020. Now, in-person meetings and depositions in other matters have resumed and at a fast
 10 pace. Indeed, Counsel has been conducting in-person meetings and attending depositions nearly
 11 daily. Because of this, Counsel is requesting an additional thirty (30) days to file dispositive
 12 motions. This brief delay is warranted due to circumstances and will not cause harm or prejudice
 13 to any party.

14 **III. DISCOVERY.**

15 **1. Discovery Completed To Date.**

16 As stated above, discovery is now closed.

17 **2. Discovery To Be Completed.**

18 No further discovery is necessary.

19 **3. Reasons Why Discovery Incomplete.**

20 Discovery has been completed. Counsel is requesting an extension of the dispositive
 21 motion deadline due to being inundated with meetings and depositions with business operations
 22 recently resuming.

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<u>Activity</u>	<u>Current Date</u>	<u>Proposed Date</u>
Dispositive Motions	July 1, 2020	July 31, 2020
Proposed Joint Pretrial Order	July 31, 2020	August 31, 2020

Based upon the foregoing, LVMPD Defendants request the Court extend the current dispositive motion deadline for an additional thirty (30) days.

DATED this 10th day of June, 2020.

KAEMPFER CROWELL

By: /s/ *Lyssa S. Anderson*

LYSSA S. ANDERSON (Nevada Bar No. 5781)
 RYAN W. DANIELS (Nevada Bar No. 13094)
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***Attorneys for Defendants
Jonathan Solis and Joel Tomlinson***

IT IS SO ORDERED.

Dated: June 11, 2020

Daniel J. Albregts
United States Magistrate Judge

CERTIFICATE OF SERVICE

I certify that I am an employee of KAEMPFER CROWELL, and that on the date below, I caused the foregoing **JONATHAN SOLIS and JOEL TOMLINSON'S MOTION TO EXTEND DISPOSITIVE MOTION DEADLINE (1st Request)** to be served via CM/ECF and/or First Class Mail (where indicated) addressed to the following:

George A. Tolliver
867 N. Lamb Blvd., #203
Las Vegas, NV 89110

Plaintiff, Pro Se

(Via U.S., First Class Mail)

Adam D. Honey
Office of the Attorney General
555 E. Washington Ave. Ste. 3900
Las Vegas, NV 89101
***Attorney for Defendants Eva Tanner and
Shane Brandon***

DATED this 10th day of June, 2020.

/s/ Bonnie Jacobs
an employee of Kaempfer Crowell